

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

QUORUM HEALTH CORPORATION, *et al.*,

Debtor.

Chapter 11

Case No. 20-10766 (BLS)

DANIEL H. GOLDEN, AS LITIGATION
TRUSTEE OF THE QHC LITIGATION
TRUST, AND WILMINGTON SAVINGS
FUND SOCIETY, FSB, SOLELY IN ITS
CAPACITY AS INDENTURE TRUSTEE,

Plaintiffs,

v.

COMMUNITY HEALTH SYSTEMS, INC.;
CHS/COMMUNITY HEALTH SYSTEMS,
INC.; REVENUE CYCLE SERVICE CENTER,
LLC; CHSPSC, LLC; PROFESSIONAL
ACCOUNT SERVICES, INC.; PHYSICIAN
PRACTICE SUPPORT, LLC; ELIGIBILITY
SCREENING SERVICES, LLC; W. LARRY
CASH; RACHEL SEIFERT; ADAM
FEINSTEIN; AND CREDIT SUISSE
SECURITIES (USA) LLC,

Defendants.

Adv. Pro. No. 21-51190 (BLS)

Ref. Docket No. 43

NOTICE OF COMPLETION OF BRIEFING ON MOTION TO DISMISS

PLEASE TAKE NOTICE THAT briefing is complete on *Defendants Community Health Systems, Inc., CHS/Community Health Systems, Inc., Revenue Cycle Service Center, LLC, CHSPSC, LLC, Professional Account Services, Inc., Physician Practice Support, LLC, Eligibility Screening Services, LLC, W. Larry Cash, Rachel Seifert, and Adam Feinstein's Motion to Dismiss* [Adv. Dkt. No. 43] (the "Motion to Dismiss") filed on January 14, 2022. The following pleadings

are relevant to the Court's consideration of the Motion to Dismiss and will be delivered to Chambers:

1. Complaint [Adv. Dkt. No. 1, filed October 25, 2021];
2. Defendants Community Health Systems, Inc., CHS/Community Health Systems, Inc., Revenue Cycle Service Center, LLC, CHSPSC, LLC, Professional Account Services, Inc., Physician Practice Support, LLC, Eligibility Screening Services, LLC, W. Larry Cash, Rachel Seifert, and Adam Feinstein's Motion to Dismiss [Adv. Dkt. No. 43, filed Jan. 14, 2022];
3. Sealed Memorandum in Support of Defendants Community Health Systems, Inc., CHS/Community Health Systems, Inc., Revenue Cycle Service Center, LLC, CHSPSC, LLC, Professional Account Services, Inc., Physician Practice Support, LLC, Eligibility Screening Services, LLC, W. Larry Cash, Rachel Seifert, and Adam Feinstein's Motion to Dismiss [Adv. Dkt. No. 44, filed Jan. 14, 2022];
4. Sealed Declaration of Gary A. Orseck in Support of Memorandum in Support of Defendants Community Health Systems, Inc., CHS/Community Health Systems, Inc., Revenue Cycle Service Center, LLC, CHSPSC, LLC, Professional Account Services, Inc., Physician Practice Support, LLC, Eligibility Screening Services, LLC, W. Larry Cash, Rachel Seifert, and Adam Feinstein's Motion to Dismiss [Adv. Dkt. No. 45, Jan. 14, 2022];
5. Brief of Plaintiffs Daniel H. Golden, as Litigation Trustee of the QHC Litigation Trust, and Wilmington Savings Fund Society, FSB, Solely in Its Capacity as Indenture Trustee, in Opposition to Motions to Dismiss [Adv. Dkt. No. 68, filed Apr. 1, 2022];
6. Reply Brief in Support of Defendants Community Health Systems, Inc., CHS/Community Health Systems, Inc., Revenue Cycle Service Center, LLC, CHSPSC, LLC, Professional Account Services, Inc., Physician Practice Support, LLC, Eligibility Screening Services, LLC, W. Larry Cash, Rachel Seifert, and Adam Feinstein's Motion to Dismiss [Adv. Dkt. No. 84, filed May 2, 2022]; and
7. Joint Request for Oral Argument in Connection with Defendants' Motions to Dismiss [Adv. Dkt. No. 89, filed May 9, 2022].

[Signature Page Follows]

Date: May 11, 2022

Respectfully submitted,

/s/ Michael S. Neiburg

Michael S. Neiburg (DE No. 5275)
Christopher M. Lambe (DE No. 6846)
YOUNG CONAWAY STARGATT
& TAYLOR LLP
Rodney Square
1000 North King St.
Wilmington, DE 19801
Tel.: (302) 571-6600
Fax: (302) 571-1253
mneiburg@ycst.com

Counsel for Defendants Community Health Systems, Inc., CHS/Community Health Systems, Inc., Revenue Cycle Service Center, LLC, CHSPSC, LLC, Professional Account Services, Inc., Physician Practice Support, LLC, Eligibility Screening Services, LLC, W. Larry Cash, Rachel Seifert, and Adam Feinstein

Gary A. Orseck (admitted *pro hac vice*)
Alison C. Barnes (admitted *pro hac vice*)
William J. Trunk (admitted *pro hac vice*)
Jack A. Herman (admitted *pro hac vice*)
Lauren C. Andrews (admitted *pro hac vice*)
Jason A. Shaffer (admitted *pro hac vice*)
KRAMER LEVIN ROBBINS RUSSELL
2000 K Street, N.W., 4th Floor
Washington, D.C. 20006
Tel: (202) 775-4500
Fax: (202) 775-4510
gorseck@kramerlevin.com

Counsel for Defendants Community Health Systems, Inc., CHS/Community Health Systems, Inc., Revenue Cycle Service Center, LLC, CHSPSC, LLC, Professional Account Services, Inc., Physician Practice Support, LLC, Eligibility Screening Services, LLC, W. Larry Cash, and Rachel Seifert

ROLNICK KRAMER SADIGHI LLP

Marc B. Kramer (admitted *pro hac vice*)
Matthew Peller (admitted *pro hac vice*)
1251 Avenue of the Americas
New York, New York 10020
Tel: (212) 597-2800
Fax: (212) 597-2801
mkramer@rksllp.com

Sheila Sadighi (admitted *pro hac vice*)
300 Executive Drive
West Orange, New Jersey 07052

Counsel for Defendant Adam Feinstein